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January 13, 2004

BY ELECTRONIC COMMENT FILING SYSTEM

Marlene Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
TW-A325
Washington, DC 20554

**Re: Interim Report on Implementation of Wireless Enhanced 911
Phase II Automatic Location Identification (ALI) of ComScape
Telecommunications of Raleigh-Durham License, Inc. for
Station KNLG699 and of ComScape Telecommunications of
Wilmington License, Inc. for Station KNLG700
CC Docket No. 94-102**

Dear Ms. Dortch:

On behalf of ComScape Telecommunications of Raleigh-Durham License, Inc. ("ComScape Raleigh-Durham") and ComScape Telecommunications of Wilmington License, Inc. ("ComScape Wilmington") (both companies collectively referred to as "ComScape"), and pursuant to *Revision of the Commission's Rules to Ensure Compatibility with Enhanced 911 Emergency Calling Systems*, Order to Stay, CC Docket No. 94-102, FCC 03-241 released October 10, 2003, at paras. 30, 36, we hereby submit their Interim Report on Implementation of Wireless Enhanced 911 Phase II Automatic Location Identification ("ALI") Systems in CC Docket No. 94-102.

Background/Contact Information

Carrier Identifying Information

Carrier Name: ComScape Telecommunications of Raleigh-Durham License, Inc.
Carrier FRN: 0003013398

Carrier Name: ComScape Telecommunications of Wilmington License, Inc.
Carrier FRN: 0003013372

The name, title, address, telephone number, facsimile number and e-mail address of the person or persons responsible for the carrier report

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Interim Report

The number of Phase I and Phase II requests from PSAPs (including those the carrier may consider invalid)

ComScape has not received any PSAP requests.

The carrier's specific technology choice (i.e., network-based or handset-based solution, as well as the type of technology used)

ComScape has chosen a handset-based solution that utilizes assisted Global Positioning System ("GPS") handsets to provide Automatic Location Identification ("ALI") for Phase II E911 Services. This technology was chosen based on its accuracy, service availability, and ease of implementation that will best serve the customer's public safety needs. ComScape utilizes Code Division Multiple Access ("CDMA") for its air interface.

Status on ordering and/or installing necessary network equipment

It is ComScape's intent to provide E911 Phase II service to each PSAP within six months of each valid PSAP request for Phase II service.

If the carrier is pursuing a handset-based solution, the Report must also include information on whether ALI-capable handsets are now available, and whether the carrier has obtained ALI-capable handsets or has agreements in place to obtain these handsets

ALI-capable handsets are available, ComScape has obtained them and will continue to obtain them. At least 25% of ComScape's new activations have ALI-capable handsets, and ComScape anticipates that it will be able to comply with the schedule stated in ComScape Wilmington's report and waiver request filed on August 19, 2002 and in ComScape Raleigh-Durham's report and waiver request filed on October 23, 2003.

The estimated date on which Phase II service will first be available in the carrier's network

It is ComScape's intent to provide E911 Phase II service to each PSAP within six months of each valid PSAP request for Phase II service.

Information on whether the carrier is on schedule to meet the ultimate implementation date of December 31, 2005

ComScape is on schedule to meet the ultimate implementation date of December 31, 2005. Although ComScape has customers with legacy handsets that are not ALI-capable, ComScape anticipates that at least 95% of its embedded customer base will have ALI-capable handsets by December 31, 2005.

Please address any inquiries regarding this matter to the undersigned.

Respectfully submitted,

/s/

Jeanne W. Stockman